

JEFFREY LICHTMAN
JEFFREY EINHORN
JASON GOLDMAN

LAW OFFICES OF
JEFFREY LICHTMAN
11 EAST 44TH STREET
SUITE 501
NEW YORK, NEW YORK 10017
www.jeffreylichtman.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#: 2/21/22
DATE FILED: 2/21/22

PH: (212) 581-1001
FX: (212) 581-4999

February 18, 2022

BY ECF

Hon. Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Oberholzer, et al., 21 CR 475 (ALC)

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request a modification of the defendant's conditions of release which would permit him to travel to Denver, Colorado on February 23 and return home to California that same day in order to attend a business meeting at the Gaylord Convention Center and inspect design changes for a product that he is developing. Pretrial Services, by PTSO Dominique Jackson, takes no position on the defendant's application. Additionally, my office attempted to reach AUSA Jilan Kamal on February 15, 17 and 18 for the government's position on this application without success, but given the approaching date of the requested travel, I believed it prudent to put the defendant's application before the Court at this time. If approved, Mr. Oberholzer would provide Pretrial Services with a detailed itinerary of his trip.

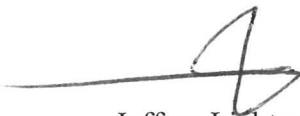
By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500K personal recognizance bond secured by two financially responsible persons, with conditions including, *inter alia*, that the defendant's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, the defendant has remained compliant with his conditions of release.

JEFFREY LICHTMAN

Hon. Andrew L. Carter, Jr.
United States District Judge
February 18, 2022
Page 2

Thank you for the Court's consideration on this application; I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Jilan Kamal Esq.
Assistant United States Attorney (by ECF)

Dominique Jackson
Pretrial Services (by email)

So Ordered:



Hon. Andrew L. Carter, Jr. 2/21/22